

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

**JAMIE WEATHERFORD and
KIMBERLY WEATHERFORD, on behalf
of themselves and all others similarly
situated,**

Plaintiffs,

v.

**E.I. DUPONT DE NEMOURS &
COMPANY, THE CHEMOURS
COMPANY, FC, LLC, 3M LLC, and 3M
COMPANY,**

Defendants.

Case No.: _____

**DEFENDANT 3M COMPANY'S
ANSWERS TO LOCAL CIVIL RULE
26.01 INTERROGATORIES**

COMES NOW Defendant 3M Company, by and through counsel, and responds to the Interrogatories required by Local Civil Rule 26.01 for the United States District Court for the District of South Carolina as follows:

Interrogatory A: State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: 3M Company is not currently aware of persons or entities who may have a subrogation interest in any claim in this lawsuit.

Interrogatory B: As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiffs have demanded a trial by jury on all claims raised in their Complaint.

Interrogatory C: State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3)

each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: 3M Company is a publicly-owned company. (1) 3M India Limited; (2) No publicly-owned company owns 10% of more of 3M Company's stock; (3) 3M India Limited.

Interrogatory D: State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER: 3M Company believes venue is proper in this Court pursuant to 28 U.S.C. §§ 121 and 1441(a) because the Court of Common Pleas, Fourth Judicial Circuit, of Darlington County, South Carolina, is located within the Florence Division of the District of South Carolina.

Interrogatory E: Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: 3M Company is not currently aware of related actions filed in this District.

Interrogatory F: If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: 3M Company is properly identified. The caption of the Complaint identifies “3M LLC” as a defendant in addition to “3M Company,” but the body of the Complaint does not make any reference to “3M LLC,” much less assert any causes of action against it or offer any allegations concerning any putative involvement by “3M LLC” in the alleged conduct at issue. Moreover, there is no entity known as “3M LLC” that has any affiliation with 3M Company.

Interrogatory G: If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Given that discovery has not begun and 3M is still investigating the allegations in this matter, 3M is not presently aware of another person or legal entity that is liable to 3M Company or Plaintiffs.

Respectfully submitted,

s/ Brian C. Duffy

Brian C. Duffy (Fed. ID No. 9491)

Patrick Wooten (Fed. ID No. 10399)

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May 3, 2022

Charleston, South Carolina